

1
2
3
4
5 **BEFORE THE WASHINGTON STATE**
6 **OFFICE OF THE INSURANCE COMMISSIONER**

7 In the Matter of

No.: G02-45

8 THE APPLICATION REGARDING
9 THE CONVERSION AND
10 ACQUISITION OF CONTROL OF
11 PREMERA BLUE CROSS AND ITS
12 AFFILIATES

OIC STAFF'S MOTION FOR
PROTECTIVE ORDER

13 COMES NOW the Office of the Insurance Commissioner's Staff (OIC), by and through
14 its attorneys, CHRISTINE O. GREGOIRE, Attorney General, and MELANIE DELEON,
15 Assistant Attorney General, and requests that a Protective Order be entered in this matter for
16 Bates numbered documents LUN-00000427-428 and LUN-00000578-581 that were withheld
17 from document production prior to the deposition of Joe Lundy on November 17, 2003. Copies
18 of these documents are being provided, under seal, to the Special Master for *in-camera* review.
19 This motion is based on the records and files herein and the Declaration of Robert J. Fallis,
20 attached.

21 DATED this 19th day of November, 2003.

22 MELANIE DELEON, WSBA 30100
23 Assistant Attorney General
24
25
26